

# EXHIBIT A

TO REPLY TO THE BOLADIAN PARTIES' RESPONSE  
TO DEFENDANTS' MOTION FOR SANCTIONS

**From:** [James Allen](#)  
**To:** [Howard Hertz](#); [Peter Doyle](#)  
**Cc:** [Joseph A. Bellanca](#); [Dan Quick](#)  
**Subject:** Re: Worrell v Thang - Westbound document production  
**Date:** Monday, December 2, 2024 10:43:43 PM  
**Attachments:** [image001.png](#)

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Howard:

You should read your colleague's production more closely. There is an email dated August 16, 2024 at 3:22pm from Sarah Catlett to Judie Worrell (bcc'd to Mr. Boladian) that the Westbound Statement would be sent "in another week or so". Am I to believe that "a week or so" is three months?

I'll respond to your request(?) for the scheduling change after I review my calendar and discuss with Peter his availability.

Jim Allen

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**From:** Howard Hertz <hhertz@hertzschram.com>  
**Sent:** Monday, December 2, 2024 7:22 PM  
**To:** Peter Doyle <Peter.Doyle@sbdetroit.com>  
**Cc:** Joseph A. Bellanca <jbellanca@hertzschram.com>; James Allen <james.allen@sbdetroit.com>; Dan Quick <dquick@dickinsonwright.com>  
**Subject:** RE: Worrell v Thang - Westbound document production

Counsel:

As I understand it, a Westbound statement has not yet been sent to Judie Worrell, but an advance for \$5,000 was sent based on the attached figures (which were not sent to her). Additionally, I've been advised that Mr. Boladian will not be available on Wednesday for his deposition until 1:00 p.m. due to his ongoing health issues.

HH

**Howard Hertz, Esq.**

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**From:** Peter Doyle <Peter.Doyle@sbdetroit.com>  
**Sent:** Monday, December 2, 2024 4:09 PM  
**To:** Howard Hertz <hhertz@hertzschr.com>  
**Cc:** Joseph A. Bellanca <jbellanca@hertzschr.com>; James Allen <james.allen@sbdetroit.com>  
**Subject:** Worrell v Thang - Westbound document production

**\*\*EXTERNAL SENDER\*\***

Mr. Hertz:

We've reviewed the documents you produced on November 26, 2024. It appears the production only contains Bridgeport royalty statements. However, the PDF named "Armen Corr wWorrell – 112224" contains an August 16, 2024 email referencing a "Westbound payment" to Judie Worrell with a "Westbound statement" that would be sent "in another week or so." If that Westbound statement and other documents evidencing payments from Westbound were produced, please direct me to their location in the production. Otherwise, please produce that August 2024 Westbound statement, and any other documents (including communications) regarding payments from Westbound to the Plaintiff's representative(s), as the Court ordered.

We request this production immediately so that we have sufficient time to review the documents before Mr. Boladian's deposition on Wednesday.

Peter E. Doyle



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Howa

<b>Track</b>	<b>Worrell Share</b>
A Joyful Process	3.929239117
Alice In My Fantasies	3.979790022
America Eats Its Young	5.362973724
Atmosphere	2.726186252
Back In Our Minds	43.80581504
Balance	4.714215164
Be My Beach	4.173852127
Better By The Pound	3.886307082
Biological Speculation	38.22541926
Butt-to-Butt resurrection	2.576466219
Can You Get To That	3585.678272
can you get**	5.640853546
Can't Stand The Strain	4.118850398
Cosmic Slop	21.80707434
Everybody Is Going To Make It This Time	5.326995569
Funky Dollar Bill	8.285111787
Get Off Your Ass & Jam	1.134760694
Get Off Your Ass And Jam	14.93483177
Good Thoughts, Bad Thoughts	27.99224061
Good To Your Earhole	7.232638509
Hit It & Quit It	1.134760694
Hit It And Quit It	141.2107085
How Do Yeaw View You	1.245168933
How Do Yeaw View You?	1.856802373
I Got A Thing, You Got A Thing, Everybody Got A Thing	7.217330405
I Got a Thing, You Got a Thing, Everybody's Got a Thing	6.062407286
I Owe You Something Good	1.213958215
I Wanna Know If It's Good To You	8.460891602
I'll Bet You	9.881522316
I'll Stay	25.11740304
I'm Never Gonna Tell It	4.672531104
I'm Never Gunna Tell It	0.0153
If You Don't Like The Effects, Don't Produce The Cause	6.240117261
Jimmy's Got A Little Bit Of Bitch In Him	8.080325233
Joyful Process, A	3.700254264
Let's Make It Last	4.497941805
Let's Take It To The People	2.86232917
Let's Take It To The Stage	7.026012286
Loose Booty	9.097951188
Maggot Brain	1237.884603
Maggot Brain (Live)	3.015339981
March To The Witch's Castle	5.928208003
Miss Lucifer's Love	4.885532291
Nappy Dugout	9.133653222

No Compute	5.964882441
No Head, No Backstage Pass	2.920161715
Philmore	5.102957247
Pussy	3.700254264
Red Hot Mama	10.07509023
Red Hot Momma	5.640853546
Sexy Ways	8.863406852
Standing On The Verge Of Getting It On	23.94081681
Super Stupid	61.52762596
Take Your Dead Ass Home (Say Som'n Nasty)	1.366549553
Take Your Dead Ass Home! (Say Som'n Nasty)	1.848802373
Tales Of Kidd Funkadelic (Opusdelite Years)	2.43867716
That Was My Girl	4.924638111
The Song Is Familiar	9.390231771
This Broken Heart	6.593217071
Trash A Go-Go	0.0081
Trash A-Go-Go	2.114390879
Trash-A-Go-Go	1.845555179
Undisco Kidd	6.352245606
Wake Up	4.555813144
Wars Of Armageddon	40.74402673
We Hurt Too	4.754794257
You & Your Folks, Me & My Folks	1.134760694
You And Your Folks, Me And My Folks	55.59127398
You Can't Miss What You Can't Measure	7.04257382
You Hit The Nail On The Head	6.044755018
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